

# Exhibit 2

**Subject:** Follow-up Discovery Requests  
**Date:** Monday, March 15, 2021 at 7:43:59 PM Eastern Daylight Time  
**From:** Nina Ginsberg  
**To:** Prabhu, Jay (USAVAE), Clayman, William G (USAVAE)  
**CC:** Jon Jeffress, Jade Chong-Smith, Zachary Deubler, Nina Ginsberg  
**Attachments:** image001.jpg, image004.jpg, 2021.03.15 Discovery Letter - US v. Sanders.pdf

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Jay and Bill,

In keeping with our call last week, attached is our letter detailing the additional discovery we are requesting the government produce in this case. There are several exhibits attached to the discovery letter, including a declaration prepared by Anthony Ferrante who had significant experience working at the FBI and 25 years of top-level cybersecurity experience. I hope that you will take these requests seriously, including not falling back on Judge Ellis' suppression ruling as a basis for claiming that the government has satisfied its *Brady* obligations. We look forward to hearing from you.

Nina



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ATTORNEYS AT LAW

OUR EXPERIENCE.  
YOUR EDGE.

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